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Attorneys for Defendant and Counterclaim-
Plaintiff Sayers Construction, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, For
the Use of Benefit of SOURCE
HELICOPTERS, DIVISION OF
ROGERS HELICOPTERS, INC., a
California corporation,

Plaintiff,

vs.

SAYERS CONSTRUCTION, LLC, a
Texas limited liability company
PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
PENNSYLVANIA corporation; and
DOES I-V and ROE CORPORATIONS I-
V,

Defendants.

Case No.: 2:19-cv-1602-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINES OF THE
STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER
(Sixth Request)**

1 Use-Plaintiff, Source Helicopters, Division of Rogers Helicopters, Inc. (“Plaintiff” or
2 “Rogers”), and Defendants, Sayers Construction, LLC (“Sayers”) and Philadelphia Indemnity
3 Insurance Company (“PIIC”) by and through their attorneys, hereby stipulate and request the Court
4 extend certain dates as contained in the *Stipulation and Order to Extend Deadlines of the Stipulated*
5 *Discovery Plan and Scheduling Order (Fifth Request)*, filed on March 4, 2021 [Dkt. # 61] (“Fifth
6 Extension of Scheduling Order”). This is the sixth stipulation to extend deadlines in this matter. In
7 support of this stipulation and request, the following is provided, pursuant to LR IA 6-1 and LR 26-4:

9 The deadline for filing dispositive motions in this action is currently set for Monday, May 24,
10 2021. Counsel for Sayers has a separate matter set for trial on Thursday, May 20, 2021, to which
11 counsel must travel. This trial date was set following the parties’ submission of the Fifth Extension of
12 Scheduling Order in this matter, and it was unclear whether the trial would proceed during the
13 pendency of various pre-trial motions. Those pre-trial motions were decided on May 12, 2021, and
14 trial is proceeding on May 20, 2021. The trial has required an extensive amount of preparation from
15 Sayers’s counsel that has taken away time from the adequate preparation of dispositive motion briefing
16 in the present matter. Counsel for the parties conferred on May 14 and 17, 2021, and are in agreement
17 on the requested extension.
18

19 In consideration of the above, the parties submit good cause is present for their request for an
20 extension of the current deadline for filing dispositive motions. The parties propose the following
21 deadline extensions:
22

- 23 • The current May 24, 2021 deadline for filing dispositive motions shall be extended to
24 **Friday, May 28, 2021.**
- 25 • The current June 23, 2021 deadline for filing the joint pretrial order shall be extended
26 to not later than thirty (30) days after the above-referenced extended May 28, 2021 date
27 set for filing dispositive motions, i.e., **June 27, 2021.** Pursuant to L.R. 26-1(b)(5), in
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the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court.

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By /s/ Maeghan Whitehead

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Dated: May 17, 2021

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Dated: May 17, 2021

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Attorneys for Use-Plaintiff

Dated: May 17, 2021

IT IS SO ORDERED:


U.S. MAGISTRATE JUDGE

DATED: May 18, 2021